

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF ILLINOIS EASTERN DIVISION**

ALFREDO GONZALEZ,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 22 CV 6496
REYNALDO GUEVARA, JOANN)	
HALVORSEN as PERSONAL)	District Judge John F. Kness
REPRESENTATIVE of the ESTATE OF)	Magistrate Judge Heather K. McShain
ERNEST HALVORSEN, EDWARD)	
MINGEY, STEVEN GAWRYS, LEE)	
EPPLEN, FERNANDO MONTILLA,)	
ROLAND PAULNITSKY, RICHARD)	
SCHAK, ROBERT SMITKA, JENNIFER)	
BOROWITZ, FRANK DiFRANCO, JOHN)	
PERKAUS, the CITY OF CHICAGO, and)	
COOK COUNTY,)	
)	
Defendants.)	

**AGREED MOTION FOR ENTRY OF AMENDED CONFIDENTIALITY
PROTECTIVE ORDER**

Plaintiff, by his respective undersigned counsel, moves this Honorable Court for entry of an amended protective order and, in support, state as follows:

INTRODUCTION

1. Plaintiff proposes an amended confidentiality order that includes an updated list of cases from which the parties may share and rely upon document production. Paragraph 13(d) of the current protective order includes a list of cases in which documents designated confidential may have been produced, and provides that the parties may rely on and produce confidential documents from those cases in the instant case.

2. Plaintiff's counsel discovered that seven cases were omitted from this list due to an administrative error. The parties now move this court to enter the amended protective order that includes the full list of cases the parties have agreed should be included under Paragraph 13(d). The proposed amended order is attached to this motion as Exhibit A.

3. On August 8, 2025, Plaintiff conferred with Defendants regarding the proposed amended order and Defendants have agreed to the request.

4. WHEREFORE, for these reasons, Plaintiff respectfully requests the Court enter the amended protective order.

RESPECTFULLY SUBMITTED,

/s/ Sean Starr

Counsel for Plaintiff

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